

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

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DAVIS INTERNATIONAL, LLC, HOLDEX,	:	
LLC, FOSTON MANAGEMENT, LTD, and	:	
OMNI TRUSTHOUSE, LTD,	:	
	:	C.A. No. _____
Plaintiffs,	:	
v.	:	
	:	
NEW START GROUP CORP., VENITOM	:	
CORP., MDM BANK, URAL-GORNO	:	
METALURAGICAL COMPANY, EVRAZ	:	
HOLDING, MIKHAIL CHERNOI, OLEG	:	
DERIPASKA, ARNOLD KISLIN,	:	
MIKHAIL NEKRICH, and	:	
ISKANDER MAKMUDOV,	:	
	:	
Defendants.	:	
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NOTICE OF REMOVAL

Defendant Arnold Kislin (“Kislin”) hereby files this notice of the removal of this civil action to the United States District Court for the District of Delaware from the Court of Chancery of the State of Delaware in and for New Castle County. Removal is pursuant to 28 U.S.C. § 1441 and 1446.

1. On April 26, 2005, plaintiffs Davis International, LLC, Holdex, LLC, Foston Management, LTD and Omni Trusthouse, LTD (collectively, “Plaintiffs”) filed an action against Kislin, as well as New Start Group Corp., Venitom Corp., MDM Bank, Ural-Gorno Metaluragical Company, Evraz Holding, Mikhail Chernoi, Oleg Deripaska, Mikhail Nekrich and Iskander Makmudov (collectively, “Defendants”) in the Court of Chancery of the State of Delaware (the “State Court Action”). The civil action number is 1297-N.

2. A true and correct copy of the Complaint is attached hereto as Exhibit A. Upon information and belief, no party has been served with the Complaint. No other pleadings have been filed in the State Court Action. No court orders have been issued in the State Court Action.

3. The Complaint alleges diversity of citizenship between Plaintiffs and Defendants. (Cmplt. ¶¶ 15-18, 22-23, 25-32).

4. The Complaint requests compensatory damages “in excess of \$ 500 million.” (*Id.*, Wherefore Cl. (a)).

5. The State Court Action is a civil action over which this Court has jurisdiction under 28 U.S.C. § 1332(a)(3) because the amount in controversy exceeds the sum of \$ 75,000 and there is diversity of citizenship between Plaintiffs and Defendants.

6. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

7. This Notice of Removal is accompanied by copies of all process, pleadings and orders in the State Court Action, including the Complaint. (Exhibit A).

8. Promptly after filing this Notice of Removal, a true and correct copy will be filed with the Register in Chancery for the Court of Chancery of the State of Delaware in and for New Castle County.

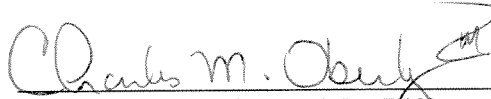
9. Written notice of the filing of this Notice of Removal will be given to Plaintiffs pursuant to 28 U.S.C. § 1446(d).

10. By filing this Notice of Removal, Kislin does not waive any defenses that may be available to him.

WHEREFORE, Defendant Arnold Kislin hereby removes the State Court Action to this Court and respectfully requests that the action proceed in this Court as a matter properly removed.

OBERLY, JENNINGS & RHODUNDA, P.A.

Dated: April 27, 2005



Charles M. Oberly, III (No. 743)
Karen V. Sullivan (No. 3872)
800 Delaware Avenue, Suite 901
P.O. Box 2054
Wilmington, DE 19899-2054
(302) 576-2000 – Telephone
(302) 576-2004 – Facsimile

Attorneys for Defendant Arnold Kislin

Of Counsel:

Lawrence S. Goldman
LAW OFFICES OF LAWRENCE S. GOLDMAN
500 Fifth Avenue
New York, NY 10110
(212) 997-7499 – Telephone

- and -

Lisa C. Cohen
SCHINDLER COHEN & HOCHMAN LLP
100 Wall Street, 15th Floor
New York, NY 10005
(212) 277-6300 – Telephone